

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION

TRUE THE VOTE, *et al.*

PLAINTIFFS

V.

CIVIL ACTION NO.: 3:14-CV-532-NFA

THE HONORABLE DELBERT ROSEMAN,
in his official capacity, as Secretary of State for the
State of Mississippi, *et al.*,

DEFENDANTS

STATE OF MISSISSIPPI

COUNTY OF LAUDERDALE

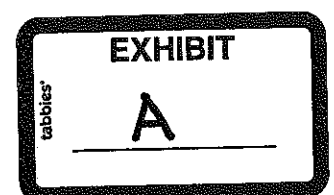
AFFIDAVIT OF TINA MOORE

COMES NOW the undersigned, Tina Moore, being duly sworn, states on her oath
as follows:

1. I am over the age of 21 years, have personal knowledge and am competent
to testify regarding the matters contained herein.

2. I am the Chief Deputy Clerk to the Circuit Clerk of Lauderdale County.
The Circuit Clerk is Donna Jill Johnson.

3. On the morning of July 7, 2014, I was at work in the office of the Circuit
Clerk of Lauderdale County. The office is located on the first floor of the Lauderdale
County Courthouse in Meridian, Mississippi. On that occasion, personnel from the Chris
McDaniel campaign were present in the vault located within the Circuit Clerk's office
reviewing documents from the recent June 24, 2014 primary run-off election between



Chris McDaniel and Thad Cochran. Election Commissioner Awana Simmons was supervising those persons as they were conducting their review; Election Commissioner Wallace Heggie was also in the vault at various times during the morning.

4. During this time, a man and woman came into the office and asked if they could see the absentee ballots for the last two elections in June. They showed me their name badges and stated that they were with a group from Texas called True The Vote. They also handed me papers to assist in confirming that they were associated with True The Vote, as well as other slips of paper which included a description of specific documents that they wanted. Either the man or woman stated that True The Vote representatives were going to all of the counties in Mississippi seeking this same type of information.

5. I informed the couple that representatives from the McDaniel campaign were present at that time and were reviewing materials from the run-off election. The man and woman asked if they could go into the vault to observe the activities of the McDaniel campaign representatives and also to review absentee ballots. I then went into the vault and returned with Election Commissioner Wallace Heggie so that he could assist the couple. Mr. Heggie asked the couple to wait while he made a telephone call to the Secretary of State's office to obtain a recommendation regarding their request. I did not hear the entire conversation between Mr. Heggie and the couple. However after Mr. Heggie entered the adjacent Election Commission Office to make the telephone call, I observed the couple enter into the vault. After a short time, Mr. Heggie returned to the

main counter in the Circuit Clerk's office and asked where the couple was. I informed him that they were in the vault. Mr. Heggie then went into the vault and very quickly escorted the couple back to the main counter in the office. Mr. Heggie informed the couple that they would not be allowed to participate in the absentee ballot review at that time.

6. Mr. Heggie asked the couple if they wished to complete a written voter request form to state exactly what they needed. I then obtained the Circuit Clerk's standard form in that regard. The couple (John and Karen Hobson) filled the form out and I put it with the slips of paper that they provided earlier in the visit. I informed the Hobsons that the Circuit Clerk was out, but that when she returned I would give her the paperwork for review. I also told them that if there was anything else she needed, then she would call them. The Hobsons then left.

7. The Hobsons returned to the Circuit Clerk's office approximately an hour later. At that time the Circuit Clerk was present and met with them to address any questions they had. Also during the meeting, the Circuit Clerk reviewed with them the slips of paper they had provided to me when they first entered the office. The Hobsons explained that the slips were their last copies and they needed to get them back. The Circuit Clerk then copied the slips of paper onto a single page and then attached that page to the records request so that it would accurately reflect the precise request made by the Hobsons. Attached hereto as Exhibit "1" is a true and correct copy of their completed request with

attachment.

7. At no time during the Hobsons' visit to the Circuit Clerk's office did I hear either of them ask to review any poll book, or ask for a copy of any poll book, or for a copy of any poll book pages.

8. To my knowledge, since July 7, 2014, neither the Hobsons nor any other representative of the True The Vote has returned to either the office of the Lauderdale County Circuit Clerk or the office of the Lauderdale County Election Commission.

9. This concludes my Affidavit.

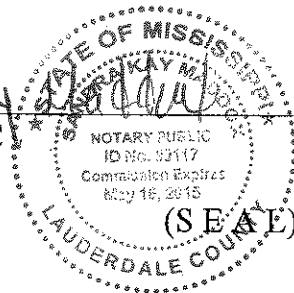
Tina Moore
Tina Moore

SWORN TO AND SUBSCRIBED BEFORE ME, this the 6 day of August, 2014.

My Commission Expires:

May 16, 2015

Donna Kay
NOTARY PUBLIC



REQUEST FOR LAUDERDALE COUNTY VOTER ROLLS

/INFO

DATE 7/7/14

YOUR PRINTED NAME

Jana Hobson

YOUR SIGNATURE

Jana Hobson

OFFICE REQUESTING

DISK

in

excel, please email to taylor.phillips1@gmail.com

MAILING ADDRESS

N/A

DAY TIME TELEPHONE #

281-796-8987

REQUEST MADE (MARK ONE) 0-999

\$25.00

✓

**** 1,000-10,999

\$50.00

**** 11,000-20,999

\$75.00

**** 21,000-

\$100.00

MARK ONE:

ALPHABETIZE BY VOTERS NAME

ALPHABETIZE BY VOTERS NAME
BY PRECINCT

ALPHABETIZE BY STREET NAME

ALPHABETIZE BY STREET NAME
BY PRECINCTOTHER

MARK ONE:

PHYSICAL ADDRESS ONLY

MAILING ADDRESS ONLY

BOTH PHYSICAL AND
MAILING ADDRESS✓*****
DATE RECEIVED _____ DATE SENT OR PICKED UP _____

RECEIVED CHECK

RECEIVED CASH

BY CLERK OR

DEPUTY CLERK

MAKE CHECK PAYABLE TO LAUDERDALE COUNTY GENERAL FUND WITH THIS FORM
 ATTACHED AND RETURN TO THE CIRCUIT CLERK OFFICE OR MAIL TO P O BOX 1005,
 MERIDIAN MS 39302-1005. IF YOU HAVE ANY QUESTIONS CALL THE CIRCUIT CLERKS OFFICE
 AT (601) 482-9731. REQUEST WILL BE COMPLIED WITHIN 7 DAYS.

EXHIBIT

tabbies

Electronic File from the June 3rd Primary (By Precinct)

-List of all the Republican Voters who voted by Precinct:

- in person on Election Day
- via absentee ballot

-List of all the Democratic Voters who voted by Precinct:

- in person on Election Day
- via absentee ballot

Electronic File from the June 24th Runoff (By Precinct)

-List of all Republican Voters who voted by Precinct

- in person on Election Day
- via absentee ballot

-List of all Democratic Voters who voted by Precinct

- in person on Election Day
- via absentee ballot